

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SECURITIES AND EXCHANGE)
COMMISSION,)
)
Plaintiff,)
)
vs.) Case No. 4:22-cv-3359
)
MAURICIO CHAVEZ,)
GIORGIO BENVENUTO, and)
CRYPTOFOX, LLC,)
)
Defendants.)
)
and)
)
CBT GROUP, LLC,)
)
Relief Defendant.)
)

ORAL AND VIDEOTAPED DEPOSITION OF
MARIA SARAVIA
DECEMBER 15, 2022

ORAL AND VIDEOTAPED DEPOSITION OF MARIA SARAVIA,
produced as a witness at the instance of the PLAINTIFF,
and duly sworn, was taken in the above-styled and
numbered cause on DECEMBER 15, 2022, from 9:17 a.m. to
6:19 p.m., before Donna L. Garza, CSR, in and for the
State of Texas, reported by machine shorthand, at the
law offices of Shook, Hardy & Bacon, LLP, 600 Travis
Street, Suite 3400, Houston, Texas, pursuant to the
Federal Rules of Civil Procedure and the provisions
stated on the record or attached hereto; that the
deposition shall be read and signed before any notary
public.
JOB No. 221215WWC

1 A. Yes. Correct.

2 Q. And it has your name on the top of it?

3 A. Yes.

4 Q. And it says the start date is December 1,

11:57 5 2020?

6 A. Okay.

7 Q. Do you believe this is your second contract

8 with CFX?

9 A. Yes. Because the first one was a thousand.

11:57 10 Q. Okay. And aside from looking at this, do you

11 remember that your second contract was for \$4,000?

12 A. Correct.

13 Q. And it says that the user here at the top of

14 the page is Mauricio Chavez, listed 1 and 2.

11:58 15 Do you see that?

16 A. Yes.

17 Q. Did Mauricio Chavez sign you up for your

18 second contract?

19 A. It was another person. They would always put

11:58 20 his name.

21 Q. Do you have any understanding about why they

22 always put his name?

23 A. No, I do not know.

24 Q. Who did you give your money to when you

11:58 25 brought in \$4,000?

1 A. Mr. Taffinder.

2 Q. Okay. And was some of that \$4,000 money that
3 you had gotten from CFX in your previous contract?

4 A. Yes. Yes. But I put some more because I
11:59 5 hadn't earned that -- that much.

6 Q. Yeah. A good result so far?

7 THE INTERPRETER: Excuse me?

8 Q. (BY MR. GULDE) A good result so far?

9 A. Yes, sir.

11:59 10 Q. Do you know of any significance of having
11 Mauricio Chavez listed as 1 and 2 at the top of this
12 document?

13 A. I think it's because he earned the Commission
14 1 and Commission 2.

12:00 15 Q. Okay. So, later contracts would show the
16 commissions explicitly in -- in this location; is that
17 right?

18 A. In the thousand?

19 Q. They would show the word "direct" and
12:00 20 "indirect" sponsor?

21 A. I don't remember about the first ones.

22 Q. Okay. Okay. How did you understand that
23 Mauricio was in -- well, let me ask a different
24 question. Sorry.

12:01 25 Did you understand that Mauricio would

1 receive 7 percent and 3 percent on your \$4,000 here?

2 A. It's what it says there, yes.

3 Q. Okay. So, seeing Mauricio here listed as 1
4 and 2 means to you that he would have received 7 percent
12:01 5 an 3 percent on your 4,000?

6 A. Yes.

7 Q. And do you have that understanding because of
8 your continued experience with CFX?

9 A. Yes, sir.

12:02 10 Q. Okay. So, let's look down at the bottom of
11 this contract.

12 It shows -- it shows that you were paid on
13 December 15th, 2020, \$800?

14 A. Yes.

12:02 15 Q. Now, I'm -- I'm a little confused. Because it
16 says the start date is 12-1. So, only 15 days have
17 passed.

18 A. I don't know. Possibly they made a mistake.
19 I don't know. I don't remember that.

12:02 20 Q. Do you remember receiving \$800 in December,
21 January, and February of '21?

22 A. Yes. Because in this one, I think they would
23 pay me monthly.

24 Q. Okay. Is that the normal practice at CFX?

12:03 25 A. Yes. At the beginning, it was every month,

1 every three months, every six months.

2 Q. Just to make sure I understand that, "at" --
3 "at the beginning," you mean in the beginning of your
4 experience with CFX?

12:03 5 A. Correct.

6 Q. You're saying at the beginning, it was CFX's
7 practice to pay out monthly?

8 A. Yes.

9 Q. So, if you look at the bottom of this contract
12:04 10 we've been looking at, Exhibit 45, it shows those three
11 monthly payments, right?

12 A. (No response.)

13 Q. And do you know -- do you know what percentage
14 800 is of 4,000?

12:05 15 A. Mr. Taffinder told us -- they said for those
16 that would help, they would give us the 20 percent. I
17 don't know if that's in there.

18 Q. Well, I'll represent to you that 800 is 20
19 percent of 4,000.

12:05 20 So, you -- you believe you were receiving
21 a 20 percent monthly payment from CFX?

22 A. Yes.

23 Q. And why is it that you understood you were
24 getting 20 rather than the 15 that we had discussed
12:05 25 before?

1 A. They told us that we would -- if we would help
2 there, because a lot of people would arrive -- that if
3 we helped there with the people and we -- those of us
4 that helped would get 20 percent.

12:06 5 THE WITNESS: May I go to the bathroom?

6 MR. GULDE: Yeah. You know what? It's
7 probably a good time for us to break for lunch. So, we
8 can go off the record.

9 THE VIDEOGRAPHER: Off the record at
12:06 10 12:06 p.m.

11 (Break from 12:06 p.m. to 1:11 p.m.)

12 THE VIDEOGRAPHER: Back on the record,
13 1:11, beginning Tape 4.

14 Q. (BY MR. GULDE) Ms. Saravia, before lunch, we
13:11 15 were discussing your first couple of contracts with CFX.
16 Do you remember that?

17 A. Yes.

18 Q. And, specifically, we were looking at Exhibit
19 No. 45, that appears to show that you were paid \$800
13:12 20 every month between December and ending in February of
21 2021.

22 A. Yes.

23 Q. And, then, Exhibit 45 shows that the next date
24 that you were paid was in July.

13:12 25 Is that how you remember it happening?

1 A. I don't remember. I'm just looking at it.

2 Q. You don't remember there being a five-month
3 gap between getting paid on this contract?

4 A. I don't remember. It's not here.

13:13 5 (Marked Saravia Exhibit 46.)

6 Q. (BY MR. GULDE) I'm going to hand you what
7 I've labeled 46.

8 A. All right.

9 Q. Now, the first page of Exhibit 46 is -- is
13:13 10 actually the signed contract that relates to the first
11 page of Exhibit 45; is that right?

12 A. Yes.

13 Q. And, so, you entered this contract with a
14 start date of December 1st, 2020; is that right?

13:14 15 A. I didn't sign this. This is not my signature.

16 Q. So, you're pointing to the bottom of the first
17 page of Exhibit 46, correct?

18 A. Here.

19 Q. Here, you're talking about the bottom of
13:14 20 Exhibit 46?

21 A. Here. All right.

22 Q. Is the answer "yes"? Are you looking at
23 Exhibit 46 with the -- the number on it?

24 A. This.

13:15 25 Q. Okay. Thank you.

1 The signatures there appear to be some
2 sort of verified digital signature; is that right?

3 MS. AGUILAR: Can I -- wait. Can I have
4 a minute?

13:15 5 MR. GULDE: Sure.

6 (Witness and counsel conferring.)

7 MR. GULDE: Did you clarify my question?

8 MS. AGUILAR: Yes. She didn't understand
9 the word "digital."

13:15 10 MR. GULDE: Okay.

11 Q. (BY MR. GULDE) So, let me ask that question
12 one more time.

13 The signatures on the bottom of Exhibit 46
14 appear to be some sort of verified digital signature,
13:15 15 right?

16 A. Oh, okay. All right.

17 Q. Are you familiar with a computer being able to
18 sign a document this way?

19 A. No.

13:16 20 Q. Are you familiar with -- with anyone using
21 digital signatures?

22 A. No.

23 Q. Okay. Are you familiar with a device being
24 used at CFX hooked up to a computer where people could
13:17 25 sign a pad?

1 Q. And, so, did you sign this document on
2 February 14th, 2022?

3 A. Yes. The date is on -- is there, 14th of
4 February.

14:43 5 Q. Do you believe that says '22 or '20?

6 A. It says '28 here.

7 Q. Are you a time traveler, Ms. Saravia?

8 A. (No response.)

9 Q. Do you know -- do you know when you would have
14:44 10 signed this?

11 A. I don't know, because here the date is -- I
12 don't know. It probably was this year.

13 Q. Yeah. It wouldn't have been 2020 because you
14 weren't involved with CFX in --

14:44 15 A. Yes. It had to be this year, I think.

16 Q. Okay. And above your signature is a list of
17 numbers. And it says: Lolly Saravia; Quantity, 1; Unit
18 Price, \$90,000.

19 Do you know what this is referring to?

14:44 20 A. They were both bonuses that they paid me. And
21 after that, I wasn't paid anything.

22 Q. So, you're saying that the -- that CFX paid
23 you \$90,000 in bonuses in February of 2022?

24 A. Correct.

14:45 25 Q. And that's the last time you received any

1 bonus or commission payment from CFX?

2 A. Yes. After that, I wasn't paid.

3 Q. Do you --

4 A. That's why I'm mad.

14:45 5 Q. Do you believe that you received \$10,000 in
6 bitcoin?

7 A. He was going to send it to me in bitcoin, but
8 I didn't want it. He gave it to me in cash. I didn't
9 want him to send that.

14:46 10 Q. And when you say "He was going to send it,"
11 who are you talking about?

12 A. Mauricio.

13 Q. Okay. Did you have a personal conversation
14 with Mauricio about whether this would be in bitcoin or
14:46 15 in cash?

16 A. Yes.

17 Q. What does \$80,000 in "contratos" mean here?

18 A. I don't know -- I don't know what it is
19 referring to, but it was bonuses that I was paid. And
14:47 20 bonuses and contracts, perhaps that's why they put it in
21 there.

22 Q. So, are -- are you saying to us today that
23 this \$90,000 includes both bonus and commission payments
24 to you and contract payments?

14:47 25 A. Yes.

1 Q. Okay. Is -- would this be broken out anywhere
2 so we could know what belonged to what?

3 A. No.

4 Q. Did you believe that this \$90,000 had been
14:47 5 correctly calculated?

6 A. I don't remember, because I don't even
7 remember this date.

8 Q. Do you remember getting paid \$90,000?

9 A. Yes.

14:48 10 Q. And did you think that's what you were owed?

11 A. I believe so. I don't -- I don't remember, to
12 tell you the truth.

13 Q. Do you think you would recall -- do you think
14 you would have known if Mauricio was shortchanging you?

14:48 15 A. I don't remember. I'm not able to tell you
16 "yes" or "no."

17 Q. After this date in February, did you earn more
18 bonuses that haven't been paid?

19 A. Bonuses I have not been paid. I don't
14:49 20 remember. I don't remember contracts. Bonuses, I have
21 not been paid.

22 (Marked Saravia Exhibit 47.)

23 Q. (BY MR. GULDE) Okay. I'm going to hand you
24 what I put exhibit sticker No. 47 on. And it's a
14:50 25 collection of documents, some of which have been

1 stapled. I would just ask you to take care -- to keep
2 them in the same order that they are right now.

3 A. Very well.

4 Q. Is this a document that you gave to your
14:50 5 lawyer to give to us?

6 A. Yes.

7 Q. Okay. And -- and what are these documents?

8 A. In the latest months -- June, July, August --
9 we were given for us to also pay people.

14:51 10 Q. You were instructed to -- to pay CFX student
11 investors?

12 A. Yes.

13 Q. Okay. Who instructed you to do that?

14 A. The office manager.

14:51 15 Q. And who is that?

16 A. Norma Chavez.

17 Q. Okay. So, prior to -- before Norma telling
18 you that, was your job just helping people fill out
19 contracts and collecting their cash for CFX?

14:52 20 A. No. The payments, I wouldn't receive. The --
21 the payments, she would receive them. I would do the
22 contracts -- Norma. I would do the contracts. They
23 would go up with the contract and pay her.

24 Q. Okay. So, before Norma gave this new
14:52 25 instruction, you would help people fill out the

1 contract?

2 A. Only.

3 Q. And at the end of your interaction with them,
4 they would have a finished contract that they would then
14:53 5 take to Norma?

6 A. That's the way it is.

7 Q. And at that point, they would give Norma
8 whatever amount of cash they needed to?

9 A. Well, cash or -- or cashier's check.

14:53 10 Q. Okay. Did you see people come in and pay with
11 cashier's checks?

12 A. Yes.

13 Q. And how often did that happen?

14 A. I don't remember.

14:53 15 Q. Often?

16 A. Maybe some two or three times a month.

17 Q. So, how did Norma announce this new policy?

18 A. Norma.

19 Q. How -- how did she --

14:54 20 MR. GULDE: Did I say "Monica"?

21 THE INTERPRETER: Maybe you did.

22 MR. GULDE: Who knows? Who knows?

23 Q. (BY MR. GULDE) So, how did Norma announce
24 this new policy?

14:54 25 A. She said that we had to do that because they

1 had a lot of work.

2 Q. "They" being the accounting office?

3 A. Correct.

4 Q. Okay. And did she say this in person?

14:55 5 A. Yes.

6 Q. Did you believe that she had permission from
7 Mauricio to make this change?

8 A. I believe so.

9 Q. Why would you think that?

14:55 10 A. Because he also said that in a meeting.

11 Q. Mauricio said that people like you would be
12 helping with payments in a meeting?

13 A. Yes.

14 Q. Okay. And he said this before Norma
14:55 15 approached you?

16 A. I don't know who was first, him or her.

17 Q. Okay. And explain to us how Norma said it
18 would work.

19 A. That we were going to do the contract; that we
14:56 20 would receive the money; and at the closure, we would
21 give it to her.

22 Q. Let me break that up into little pieces.

23 You would still help people fill out their
24 contracts?

14:56 25 A. That's the way it is.

1 Q. But now they would give you the money?

2 A. Exactly.

3 Q. Okay. And would you take the money and the
4 contract to Norma?

14:57 5 A. Yes.

6 Q. Or someone else in accounting?

7 A. No, to Norma. She was the accountant.

8 Q. Was she there every day all day?

9 A. From Monday to Friday.

14:57 10 Q. Okay.

11 A. She wouldn't go on Saturday.

12 Q. Did you -- did CFX take money in on Saturday?

13 A. Till midday.

14 Q. And who was the accountant who took the money
14:57 15 on Saturdays?

16 A. They would be different persons.

17 Q. Okay. So, is the only change in this new
18 policy that you would personally handle the money?

19 A. Yes. And that's -- that's why people think
14:58 20 that I stole the money, because they were giving the
21 money to me. But I have here that I would deliver that.

22 Q. Okay. You didn't take this money home; you
23 gave it to Norma?

24 A. No. There was a safe there. And we would
14:58 25 keep it there whenever Mrs. Norma wasn't there; and on

1 the next day, we would give it to her. If not, I'll be
2 killed if they see me with that money.

3 Q. I'm going to hand you Exhibit 41.

4 Do you recognize that as the layout of
14:59 5 Blalock?

6 A. Yes.

7 Q. Can you put it on the table and then point to
8 where the -- the safe was?

9 A. Which safe?

14:59 10 Q. Well let's talk about the one you just
11 mentioned, the safe.

12 A. Where I would keep it? At the first level.
13 It was at the end. It was in the back near the south.
14 There's an office there that had the safe.

15:00 15 Q. Are you talking about -- if you're in the
16 lobby and you're -- it's to the right of the stairs as
17 you're facing the office?

18 A. To the left hand at the end, at the very end.

19 Q. Okay. I think -- let me pull this up here
15:00 20 real quick.

21 So, left side, as you -- as you're facing,
22 left side this way?

23 A. Where the conference room was at the end.

24 MS. AGUILAR: Can she put an X on it?

15:00 25 MR. GULDE: I don't really want her to

1 write on this thing. I mean, do you guys care?

2 MS. AGUILAR: No. Would you put an X on
3 it --

4 MR. GULDE: Okay.

15:00 5 MS. AGUILAR: -- and initial it?

6 A. When you enter the building, there's the
7 reception. You have the stairs that go up, right; and
8 there to the left, at the end, there was a conference
9 room and there was a small office and there was a safe.

15:01 10 Q. (BY MR. GULDE) Would you put an X where you
11 think it is?

12 MS. THEMELI: Where do you think the safe
13 was?

14 A. It was on the first level. Near the
15:01 15 conference room on the first level.

16 Q. (BY MR. GULDE) Okay. So, that's one safe?

17 A. On the first floor.

18 Q. Okay. On the first floor.

19 Where were the other safes?

15:01 20 A. I don't know. I only knew about that one.

21 Q. Okay. And is that where the money went that
22 had been received the way we've been discussing daily?

23 A. Yes. And then after, I would deliver it to
24 the lady.

15:02 25 Q. Okay. So, for the record --

1 MR. GULDE: Oh, what does that say that
2 she's written on the exhibit?

3 THE INTERPRETER: First level.

4 MR. GULDE: Okay.

15:02 5 Q. (BY MR. GULDE) So, the witness has written
6 the words "first level" in Spanish on Exhibit 41 in blue
7 ink an area beneath second floor conference room
8 indicating location.

9 Do you have any idea how much money would
15:03 10 typically be in the safe at the end of the day?

11 A. It was different amounts.

12 Q. Do you have a range, smallest or biggest?

13 A. Sometimes 50-, maybe 100-.

14 Q. Do you know where that money would go at the
15:03 15 end of the day?

16 A. No. I would give it to Mrs. Norma. I don't
17 know where it would go.

18 Q. Okay. You would -- you would give the money
19 from the safe to Norma?

15:03 20 A. Yes. Yeah, in an envelope. She would count
21 it, and she would give me this paper.

22 Q. Okay. So, it was a daily procedure at the end
23 of -- of the day for you to take money out of the safe,
24 put it in an envelope, and give it to Norma?

15:04 25 A. Yes.

1 Q. And -- and you -- did you create this document
2 to give to Norma?

3 A. No. She would give it to me. I don't know
4 anything about computers.

15:04 5 Q. Do you know if Norma created this document?

6 A. She would give it to me. I don't know if it
7 was already in the system or what.

8 Q. Okay. But when you received it, it was on
9 paper?

15:05 10 A. Yes, on paper.

11 Q. And you apparently got to keep it?

12 A. Yes. It would remain at the office. I would
13 keep it there.

14 Q. And how did you end up with these documents
15:05 15 after the office closed?

16 A. I just -- I just by chance had found these and
17 brought them as an example.

18 Q. Do you have -- do you have any idea how these
19 particular documents ended up at your house?

15:05 20 A. Well, I would put them in my -- in my purse as
21 always documents.

22 Q. Did you use them at home?

23 A. No. I found them because she asked me to look
24 for any -- for them, and I found them.

15:06 25 Q. Well, I understand your -- your lawyer asked

1 you to find CFX documents at home.

2 But my question is: You know, do you know
3 why these ended up at your house?

4 A. Yes. Because maybe sometimes I would put it
15:06 5 in my purse. And that was good; because if not, I
6 wouldn't have brought anything. Everything was there.

7 Q. I'm glad you did.

8 But just to clarify, was -- was there --
9 was there any reason why you took these?

15:07 10 A. No --

11 Q. Do you know when --

12 A. -- no reason.

13 Q. Do you know when you would have taken them?

14 A. Neither. I have -- I have no idea.

15:07 15 Q. Do you know other people who took documents
16 like this home?

17 A. I don't know. Because different people worked
18 in different ways.

19 Q. Did CFX have any company policy about how
15:07 20 documents like this ought to be handled?

21 A. I don't know. It was given to me.

22 Q. Okay. By Norma?

23 A. Yes. She was the one in charge.

24 Q. So, looking at that front page of Exhibit 47,
15:08 25 it bears a date that has not happened yet, right?

1 THE INTERPRETER: What?

2 Q. (BY MR. GULDE) It bears a date that has not
3 happened yet.

4 A. They made a mistake.

15:08 5 Q. Yeah. You believe that '23 to be a typo?

6 A. I believe. Because over here, you can see it
7 says '22.

8 Q. Okay. And then -- but below that it says:
9 "New Contracts."

15:08 10 And it says "\$310,500"; is that right?

11 A. Correct.

12 Q. Does that mean to you that on August 26th, you
13 took in \$310,500 in new contracts from CFX student
14 investors?

15:09 15 A. Maybe not only that day, maybe two or three
16 days.

17 Q. Okay. So --

18 A. I don't remember.

19 Q. Would it have been standard for a document
15:09 20 like this to cover not only this day, but a couple of
21 days in front?

22 A. I didn't -- no, I didn't understand.

23 Q. Was it normal for this to cover more than one
24 day?

15:10 25 A. Yes, one, two, maybe three days.

1 Q. Okay. So, is it fair to say that in -- on the
2 26th of August or in the one, two, or three days
3 preceding that day, that CFX took in \$310,500 in new
4 contracts from student investors?

15:10 5 A. Yes.

6 Q. Okay. And, so, from that amount on the next
7 line, was \$56,235 taken away from that amount in
8 commissions?

9 A. That was paid to people for inviting some
15:11 10 people.

11 Q. Okay. So, from that \$310,000 that CFX took
12 in, 56,000 of that was immediately paid to people who
13 needed referral fees for those contracts?

14 A. Correct.

15:12 15 Q. And that makes sense, because it's somewhere
16 in between 15 and 20 percent of \$310,000.

17 A. That's between 7 and 3 percent. Maybe 14, 15.
18 I don't know exactly.

19 Q. Would -- would this have included some double
15:12 20 bonus referrals?

21 A. Yes.

22 Q. And would this have included the -- the
23 additional bonus outside of the referral system?

24 A. No. Only the referrals.

15:12 25 Q. Okay. So, the additional bonus would be paid

1 separately?

2 A. Yes.

3 Q. Okay. Did that previous exhibit, 44, does
4 this show -- does this include the additional bonus?

15:13 5 A. Additional bonuses. And, sometimes, it also
6 included new contracts.

7 Q. Okay. And, so, looking back to Exhibit 47,
8 from the \$310,000 that was taken in -- and this is all
9 cash, right?

15:13 10 A. And sometimes cashier's checks.

11 Q. So, from -- from that amount of cash and
12 cashier's checks, we take away the commissions; that's
13 No. 1?

14 And then what -- thank you. What is this
15:14 15 next line that says "Old Contracts"?

16 A. To pay contracts to people.

17 Q. And that, for example, is the -- the contract
18 payment that comes up in three months on somebody's
19 contract of \$5,000?

15:14 20 A. That's the way it is.

21 Q. And that's paid directly out of cash that had
22 been received in the last couple of days?

23 A. Yes. But some people asked payments in
24 bitcoin. Not all. Not all -- not all in cash. Some
15:15 25 asked for payment in bitcoins.

1 Q. And those bitcoin payments wouldn't be
2 reflected on -- on this page at least?

3 A. I don't remember that. This was being paid to
4 the people there. It was cash.

15:15 5 Q. What is this row that says "Elite"?

6 A. It's when the people invited other people,
7 like a team bonus.

8 Q. Okay. Did you ever receive a team bonus?

9 A. Yes. When they were paid, that comes included
15:15 10 in there.

11 Q. And you're talking about the -- the 90,000
12 that we were looking at for you?

13 A. And also contract. They were paid both in
14 there.

15:16 15 Q. In Exhibit 44?

16 A. Yes.

17 Q. Sometimes I have to say the actual number on
18 there just to make sure to make sure we're talking about
19 the same document.

15:16 20 Okay. So, on this particular day, no
21 elite bonuses were paid?

22 A. No.

23 Q. And, so, that 132,487 represents the money in
24 the envelope that you would hand to Norma?

15:16 25 A. No. Let me explain. I would -- I would give

1 her \$310,000 minus this -- this, the 56,000 because that
2 was paid.

3 Q. Let me make sure I understand.

4 You would hand Norma \$310,500?

15:17 5 A. No.

6 Q. Okay. Tell me again.

7 A. I would subtract the \$56,000 that I -- that I
8 already had paid the people, I.

9 Q. Okay. So, you took out the 56,235?

15:18 10 A. Yes.

11 Q. Okay. What about the 121-?

12 A. That was to pay three months contracts, and
13 they would give me the list.

14 Q. Okay. And, so, what happened to that \$121,000
15:18 15 in the moment that you were handing cash to Norma?

16 A. She would give them back to me.

17 Q. She would give you back \$121,000?

18 A. To pay all these people.

19 Q. Okay. And, so, what Norma was left in her
15:19 20 hand that day -- at the end of the day was 132,487?

21 A. Correct. Yes.

22 Q. And were all these people on the second and
23 third page of these -- of this document, were they
24 present in the office that day?

15:19 25 A. She would give me the money. I would put it

1 back into the safe. She would give me the list. That's
2 why I would take the list. Because I would make an
3 envelope with the date of the person and the amount to
4 be paid, and the person would sign the envelope for me.

15:20 5 It was a lot of work.

6 Q. The person would sign the envelope, and you
7 would keep the envelope?

8 A. I would hand them the envelope, but I would
9 take the card back.

15:20 10 Q. Okay. And they -- so, would the envelope say
11 how much was in it?

12 A. Name and amount.

13 Q. And you would have them sign it and take a
14 picture of it?

15:20 15 A. And that occurred to me to have evidence.
16 Because then later they would -- they could come back
17 and say that they weren't paid.

18 Q. Did you ever have that happen?

19 A. Once.

15:21 20 Q. Who was that?

21 A. I don't remember.

22 Q. Were you able to prove that you had paid?

23 A. Thanks to the Lord that he went to the
24 accountant. The accountant paid him and -- he was paid
15:21 25 by the accountant. But then he wanted me to pay him

1 again. And that's why it occurred to me to have in
2 evidence that nobody else could get back to me again.

3 Q. Are these photographs on the phone that you
4 brought in?

15:22 5 A. Yes, they are here.

6 Q. All of them? You didn't delete any?

7 A. Maybe not all of them. A majority of them are
8 there.

9 Q. Okay. Let's look quickly at Page No. 2 here.
15:22 10 There's a column of dates on the left.

11 Do you know what that date represents?

12 A. When the contract would expire on the person.

13 Q. It would expire, or when payment would become
14 due?

15:22 15 A. When payment was due.

16 Q. And then the second column is -- is just the
17 name of the person?

18 A. Yes, the name of the person.

19 Q. The third column is very confusing to me.

15:23 20 A. For me, too. Sometimes, they put amounts; and
21 sometimes, they put telephone numbers.

22 Q. This first amount is -- is \$8 trillion?

23 A. No. The amount is 4,500. That's the phone
24 number, 832-whatever.

15:23 25 Q. So, this is a computer formatting issue?

1 THE INTERPRETER: What's that?

2 Q. (BY MR. GULDE) This is a computer formatting
3 issue?

4 A. I don't know anything about that.

15:23 5 Q. Okay. But you believe this third column are
6 phone numbers that belong to the people?

7 A. Yes. They are phone numbers.

8 Q. And the fourth column is the amount that has
9 become due on the date that is listed in the first
15:24 10 column?

11 A. That -- what had to be paid.

12 Q. Okay. And what is -- let's run through these
13 words on the fifth column.

14 What does "Ganancias" mean?

15:24 15 A. What he earned. What he earned.

16 Q. Earnings. Okay.

17 And, then, what does "Capital" mean?

18 A. Capital is when it was returned with what they
19 had given at the beginning.

15:24 20 Q. Okay. And, then, handwritten in here -- it's
21 in red pen. It says "Sobre."

22 A. Because I made an envelope. "Sobre" means
23 envelope.

24 Q. Okay. Does "Sobre" mean that the envelope had
15:25 25 been handed over?

1 A. Yes. That -- that I made the envelope with
2 the data.

3 Q. Okay. But does it mean that you handed the
4 envelope over to the person?

15:25 5 A. Yes. Correct. I would then send a text to
6 the person. They would come by and receive their
7 envelope with the money.

8 Q. Okay. And is there any significance to the
9 stars in the third column?

15:25 10 A. That means that I have already done it. That
11 I have certain control.

12 MR. GULDE: Say again.

13 THE INTERPRETER: It had already been
14 done --

15:26 15 MR. GULDE: Okay.

16 THE INTERPRETER: -- to have a certain
17 control.

18 Q. (BY MR. GULDE) So, starting with the Reyna
19 Jeanett De Leon Romero line, there's just a single line
15:26 20 in red.

21 What does that mean?

22 A. It was 1:00 or 2:00 in the morning in doing
23 this. I would just do that and go to bed.

24 Q. Okay. No difference between that and the
15:26 25 star?

1 A. No, no difference.

2 Q. Okay. Is -- what we've just gone through,
3 was -- was this -- do you know when Norma announced this
4 new policy and put it into place?

15:26 5 A. I don't remember.

6 Q. Do you think that CFX handled cash any
7 differently before that -- before you started handling
8 cash?

9 A. I don't think so.

15:27 10 MR. GULDE: If you would -- before we
11 stack that up, let's put this on it.

12 MS. AGUILAR: I don't have a copy of
13 Exhibit 41, the layout.

14 MS. THEMELI: I can make you a copy.

15:28 15 MS. AGUILAR: Thank you.

16 MR. GULDE: Which one is 41?

17 MS. AGUILAR: The layout of Blalock.

18 MR. GULDE: Oh, yeah. I don't have -- I
19 don't have an extra one of those.

15:28 20 Q. (BY MR. GULDE) Let's talk about the closing
21 of the office.

22 Were you in the office on September 29th?

23 A. No.

24 Q. Do you know that to be the day that the
15:29 25 Blalock office closed?

1 A. Yes.

2 Q. Were you just scheduled not to come in that
3 day?

4 A. I would go Tuesday and Wednesdays.

15:29 5 Q. Okay. Who kept that schedule, by the way?
6 How did -- how did CFX know who was going to show up?

7 A. I would go Tuesdays and Wednesdays. Because
8 on Wednesdays, I would stay for the classes. That's why
9 I scheduled it what way.

15:29 10 Q. My question to you is: Was there someone at
11 CFX who organized various shifts that people worked?

12 A. That was if I wanted to go, I would go. If
13 not, not.

14 Q. Were there ever days when nobody showed up to
15:30 15 work?

16 A. Yes. Nobody showed up to make contracts, or
17 do you mean to work?

18 Q. Either one. Let's talk about contracts.

19 So, were there days when people didn't
15:30 20 show up to -- to become -- to create a contract for
21 themselves?

22 A. Yes. There were days that nobody would show
23 up.

24 Q. Were there days when CFX was just
15:30 25 understaffed?

1 A. I don't know. Because I was there from 5:00
2 to 7:00 so I could stay for the classes.

3 Q. Who, if you know -- do you -- who at CFX could
4 be counted on to be there pretty much all the time?

15:31 5 A. Can you repeat that?

6 Q. If you know, who was -- who worked most at
7 CFX?

8 A. Well, the employees.

9 Q. Which ones? I mean --

15:31 10 A. Norma Chavez was the one that was the most
11 there from Monday to Friday.

12 Q. Okay. And other accountants?

13 A. Yes and others. But the one that I most
14 communicated with was with her.

15:32 15 Q. Yeah. And people in your role would come in
16 and out?

17 A. Yes. We didn't have a schedule.

18 Q. When did you learn that the office had been
19 closed?

15:32 20 A. That same day.

21 Q. On Thursday, the 29th?

22 A. Yes.

23 Q. And what time of day did you hear?

24 A. When they shut it. The person arrived and saw
15:32 25 it, and called me and told me they had closed.

1 Q. Who was it who had arrived and called you?

2 A. A lady -- I -- I don't remember her surname
3 but her name is Judith.

4 Q. Is she someone who was coming to CFX that day
15:33 5 to receive payment?

6 A. Yes.

7 Q. And how did she have your phone number?

8 A. Because a lot of people knew me. A lot of
9 people knew me. Because some people would invite
15:33 10 people, but they weren't being helped. And they would
11 look for me and they would ask me, "Can I" -- "can you
12 help me?" I didn't even know who they were. And those
13 are the people that say that I stole because they don't
14 know me.

15:34 15 Q. And you told this woman what?

16 A. What?

17 Q. When she called you, what did you say?

18 A. She only told me it was closed. It was
19 closed.

15:34 20 Q. Was she asking you, "Why is it closed"?

21 A. I don't -- I didn't know. She was the one
22 that called me first.

23 Q. So, did you tell her, "I don't know why the
24 office is closed"?

15:35 25 A. I don't know.

1 Q. Okay. What did you do? Did you call anyone?

2 A. I started calling Raymundo and all -- and
3 everybody.

4 Q. Raymundo who?

15:35 5 THE INTERPRETER: Raymundo means
6 everybody.

7 MR. GULDE: Every Tom, Dick, and Harry?

8 THE INTERPRETER: Anybody -- anybody and
9 everybody.

15:35 10 MS. THEMELI: I never heard that before,
11 but it's a good expression.

12 A. I couldn't believe it.

13 Q. (BY MR. GULDE) Okay. And did you call
14 Mauricio?

15:35 15 A. Yes, but he didn't answer.

16 Q. Okay. When was the next time you spoke with
17 Mauricio?

18 A. I don't know. Because I started calling him
19 every day until he answered me. And he told me
15:35 20 everything was all right.

21 Q. Did you speak with Mauricio specifically about
22 the closing of the office?

23 A. Yes. And he told me everything was all right.

24 Q. Did he tell you why the office was closed?

15:36 25 A. Yes. Because he told me there was some kind

1 of problem he didn't know, about the gas.

2 Q. Okay. And did he predict when the office
3 would be open?

4 A. Yes. He told me they were going to open on
15:36 5 the 3rd of October. And I said -- and I was happy at
6 the 3rd of October. We can go and collect.

7 Q. And what happened on the 3rd of October?

8 A. They didn't open.

9 Q. Did you come and find it still closed?

15:37 10 A. Yes. I saw a paper there saying closed by the
11 Court.

12 Q. Okay. And did you call Mauricio then?

13 A. Yes. But it's -- things are going to be
14 fixed.

15:37 15 Q. That's what Mauricio said?

16 A. Uh-huh.

17 Q. Did you say, Mauricio, what does closed by
18 order of the Court mean?

19 A. Yes.

15:37 20 Q. And what did he say?

21 A. He said that somebody had gone and said
22 something about the office.

23 Q. Did he give any more details about that?

24 A. No. No.

15:38 25 Q. Did he make any predictions about what would

1 Q. And do you understand that as of the
2 appointment of Mr. Lewis, no one other than the receiver
3 can speak on behalf of CryptoFX?

4 A. Yes.

16:04 5 Q. So, anyone who tells people that they will be
6 paid by CFX will be in violation of the Court's order.

7 A. Yes.

8 Q. Anyone who organizes meetings or sends
9 messages on behalf of CFX is also in violation of the
16:04 10 Court's order.

11 Do you understand that?

12 A. Yes.

13 Q. And are you aware of anyone holding money,
14 whether it's cash or in a bank account or cryptocurrency
16:05 15 that you understand belongs to CryptoFX?

16 A. That I know? No.

17 Q. Are you aware of anyone who holds property or
18 cash money in a bank account or cryptocurrency that you
19 understand belongs to Mauricio Chavez?

16:05 20 A. No.

21 Q. I'm going to go quickly over the contracts
22 that you produced today, that you brought with you
23 today.

24 Okay. You brought some contracts with you
16:06 25 today. The first one we're going to label -- or mark

1 I'm sorry -- Exhibit 48.

2 (Marked Saravia Exhibit 48.)

3 Q. (BY MS. THEMELI) Do you see that,
4 Ms. Saravia?

16:06 5 A. Yes.

6 Q. Okay. So, it appears that the name on this
7 contract is -- it says "Karen Morales"?

8 A. Yes.

9 Q. Okay. And there's another name next to hers.
16:06 10 It says Kelly -- Kelly Galindo?

11 A. Yes.

12 Q. And who is -- who are these two individuals?

13 A. My daughters. I brought this to show that I
14 put my family into this without me knowing anything.

16:07 15 Q. Okay. And the direct sponsor on this contract
16 is Patricia Garza, and she's also the indirect sponsor.

17 Do you see that?

18 A. Garza.

19 MS. THEMELI: Yes.

16:07 20 A. Correct.

21 Q. (BY MS. THEMELI) Is that -- is that a friend
22 of yours?

23 A. Yes, a friend of ours. She was going to call
24 them because I didn't want to. And she said, "Go ahead.

16:08 25 Make some -- earn some money."

1 Q. So, how come you are not the sponsor on this
2 contract with your daughters?

3 A. Because she was the one that convinced them to
4 enter.

16:08 5 Q. Is Patricia another leader at CFX?

6 A. No. She's my friend.

7 Q. Okay. So, the contract was created -- or the
8 start date is May 19th, 2022, correct?

9 A. Yes.

16:08 10 Q. And it was a 5,000-dollar initial
11 contribution?

12 A. Yes.

13 Q. And, then, the first payment was due on
14 August 19th, 2022?

16:09 15 A. Yes.

16 Q. And there was a payment of \$2,250?

17 A. Correct.

18 Q. And -- and your daughters received that in
19 cash?

16:09 20 A. Yes.

21 Q. Have they received any other payments on this
22 contract?

23 A. No, only this.

24 Q. I'm going to move quickly to the other one
16:09 25 that I'm going to mark as Exhibit 49.

1 (Marked Saravia Exhibit 49.)

2 Q. (BY MS. THEMELI) And this is another contract
3 that you brought, correct, today?

4 A. Yes.

16:10 5 Q. And the name of the -- on the contract is
6 Silvia Chavez?

7 A. Yes.

8 Q. Is Silvia related to Mauricio?

9 A. No. No, I don't.

16:10 10 Q. And your name is there, as well, next to hers,
11 Lolly -- Lolly Saravia; is that correct?

12 A. She put me there because I'm also a friend of
13 hers, to help her receive payment. And if she died, for
14 me to collect; otherwise, she wouldn't be able to
16:11 15 collect.

16 Q. Did CFX provide some sort of estate planning
17 guidance related to these contracts?

18 THE INTERPRETER: Excuse me. What?

19 MS. THEMELI: Estate planning.

16:11 20 THE INTERPRETER: I -- I didn't hear the
21 question.

22 MS. THEMELI: Did -- let me repeat the
23 question.

24 THE INTERPRETER: Okay.

16:11 25 Q. (BY MS. THEMELI) Did CFX or any

160

1 representative of CFX provide some sort of guidance
2 when -- what would happen if someone -- the holder of a
3 contract died?

4 A. No. It occurred to me. It was at the time
16:11 5 people were dying of COVID.

6 Q. That address in there, Gable Wind Mill, is
7 that your address?

8 A. Yes.

9 Q. Okay. And Karen Morales and Lolly Sarvi --
16:12 10 Saravi -- I'm sorry -- you were the -- Karen is the
11 direct sponsor and you're the indirect sponsor on that
12 contract, correct?

13 A. That's the way it is.

14 Q. And on August 21st, 2022, it appears that
16:12 15 \$2,250 were paid on this contract; is that correct?

16 A. That's the way it is.

17 Q. Actually, I'm correcting myself. The payment
18 was due on the 21st of August, but it appears the
19 payment was made on the 26th; is that right?

16:12 20 A. It was due on the 21st. It was paid on the
21 26th.

22 Q. Okay. And did you receive your 3 percent
23 commission on this contract?

24 A. Yes.

16:13 25 Q. And Karen received her 7 percent?

1 A. That's the way it is.

2 Q. And have there been any other payments on this
3 contract?

4 A. No.

16:13 5 (Marked Saravia Exhibit 50.)

6 Q. (BY MS. THEMELI) The next one is Exhibit
7 No. 50. And that is also a contract -- a CFX contract
8 that you brought with you today.

9 Do you see that?

16:14 10 A. Yes. I see it.

11 Q. And the name on that contract is Armida
12 Fuentes and then Lorry Martinez?

13 A. Yes.

14 Q. And you were the indirect sponsor on this
16:14 15 contract, correct?

16 A. Yes.

17 Q. And Armida and Lorry, are they your friends,
18 family friends? Who are they?

19 A. Friends.

16:14 20 Q. Is -- was this their first contract, or did
21 they have any other contracts?

22 A. They had another one. This was the second
23 one.

24 Q. Were you the sponsor for their other
16:15 25 contracts?

1 A. Yes.

2 Q. Were they paid on their other -- on their
3 first contract?

4 A. Yes.

16:15 5 Q. And how much was their first contract?

6 A. Their first was 5,000.

7 Q. And were you the first -- the direct or the
8 indirect sponsor on the 5,000-dollar contract for
9 Armida?

16:15 10 A. Both.

11 Q. So when Armida got paid on her 5,000-dollar
12 contract, you were paid your commission, correct?

13 A. Yes, sir [sic].

14 Q. Okay. And were there any payments made on
16:16 15 this August 31st, 2022, contract?

16 A. No. It was due in December.

17 (Marked Saravia Exhibit 51.)

18 Q. (BY MS. THEMELI) The next one -- the next
19 exhibit, Exhibit 51. And this exhibit has two
16:17 20 contracts. These were stapled just because that's how
21 they were brought by you.

22 And the name on this contract is Pedro A.
23 Saravia and Lolly Saravia, correct?

24 A. Yes.

16:17 25 Q. And there is a No. 2 above Pedro's last name.

1 Do you see that?

2 A. It's Contract No. 2.

3 Q. Okay. And the address there is again your
4 address, correct?

16:18 5 A. Correct.

6 Q. That's your brother?

7 A. He's my brother.

8 Q. Okay. And Pedro was the direct sponsor and
9 you were the indirect sponsor on this contract?

16:18 10 A. Correct.

11 Q. And this is a contract for \$50,000.

12 Okay. And whose money was that?

13 A. Of all the family, everybody put a little bit
14 to make one.

16:18 15 Q. And who -- who chipped in to make this a
16 50-dollar contract -- who contributed to this \$50 --
17 \$50,000?

18 A. My sister, Amparo; my brother, Donald; my
19 brother-in-law, Jaime; my husband; and among all of us
16:19 20 due to receive in December for Christmas.

21 Q. You were expecting a big payout for Christmas,
22 correct?

23 A. Yes.

24 Q. And do you have written somewhere how much you
16:19 25 contributed, how much your sisters or Jaime contributed?

1 A. Not here; but at home, yes.

2 Q. Can you send that to your attorney at some
3 point so we have it for our records?

4 A. Yes, of course.

16:19 5 Q. And was there a written contract between you
6 and your family members to contribute \$50,000 for this
7 contract?

8 A. We made just a very simple paper where -- each
9 one.

16:20 10 Q. Okay. And I'm correct to say that there were
11 no payments made on this contract, right?

12 A. No. And nor none will be.

13 Q. If you turn to the second page of the -- that
14 exhibit, that is another contract that you brought with
16:20 15 you today. And the name on that contract is Bryan
16 Galindo; and there, your name is next to Bryan's.

17 Do you see that?

18 A. He is a nephew of my husband.

19 Q. And that address, again, it's your address,
16:20 20 right?

21 A. Yes.

22 Q. When you and your family were making these
23 contracts in August of 2022, did you know that Mauricio
24 had already spoken to the SEC about CFX operations?

16:21 25 A. No.

1 Q. And this contract, Bryan's and your contract
2 here, is for \$50,000, right?

3 A. Yes.

4 Q. And whose money was that, that \$50,000?

16:21 5 A. Bryan's.

6 Q. And no payments were made on that contract?

7 A. No. It was due in November.

8 Q. And you have requested this money back from
9 Mauricio?

16:22 10 A. Yes, but you have to wait.

11 (Marked Saravia Exhibit 52.)

12 Q. (BY MS. THEMELI) And that's Exhibit 52.

13 MS. THEMELI: Well, these are all stuck.

14 Q. (BY MS. THEMELI) And that's a contract for
16:24 15 Carlos Valle -- how do you pronounce that?

16 And the name -- there's two other names
17 next to Carlos, Myra Romero and Lolly Saravia, right?

18 A. Yes.

19 Q. And who's Carlos?

16:24 20 A. Brother-in-law of my daughter.

21 Q. Okay. And who is Myra Romero?

22 A. The mother, Carlos's mother.

23 Q. Okay. And this was a 5,000-dollar contract,
24 right?

16:25 25 A. Yes.

1 Q. Entered in July of this year?

2 A. Yes.

3 Q. And whose \$5,000 was that?

4 A. Carlos's.

16:25 5 Q. And is your name there next to Carlos's and
6 Myra's name just in case Carlos and Myra died and you
7 can collect on this contract?

8 A. Yes. And if both of them died, then I...

9 Q. But if Carlos died, Myra would get the
16:25 10 contract?

11 A. Correct.

12 Q. Were there any payments made on this contract?

13 A. No. It was due in October.

14 (Marked Saravia Exhibit 53.)

16:26 15 Q. (BY MS. THEMELI) Okay. The next exhibit,
16 Exhibit 53, contains four -- four contracts.

17 MS. THEMELI: Can I keep this for a
18 moment, or can I keep yours?

19 MS. AGUILAR: Sure.

16:26 20 Q. (BY MS. THEMELI) Ms. Saravia, the first name
21 on that contract is Pedro A. Saravia, right?

22 A. Yes.

23 Q. Okay. And then your name is next to hers --
24 his? I'm sorry.

16:27 25 A. Yes.

1 Q. Okay. And who is Pedro?

2 A. My brother.

3 Q. Okay. And whose address is the Grove Canyon
4 Court?

16:27 5 A. My sister's. Where he lives, too.

6 Q. And this contract was entered in August
7 22nd -- I'm sorry -- August 9th, 2022?

8 A. Yes.

9 Q. And it's a 5,000-dollar contract, right?

16:28 10 A. (No response.)

11 Q. And who -- where did that \$5,000 come from?
12 Who paid that?

13 A. Because Pedro was there. But Zonia appears
14 because they made it between both of them.

16:28 15 MS. THEMELI: I'm sorry. Can you repeat
16 that?

17 THE INTERPRETER: It's Pedro's. But
18 Zonia is there because they each paid half of it.

19 Q. (BY MS. THEMELI) But Zonia is a direct
16:28 20 sponsor on this contract. It's not -- her name is not
21 next to Pedro's?

22 A. No. Because I would help them to collect.
23 That's why they put me there.

24 Q. So, you are a co-owner of this contract?

16:29 25 A. Yes. In case he died, I could collect.

1 little follow-up on exhibit -- I think it was 41 on
2 the -- February.

3 MR. GULDE: That's the plan.

4 MS. THEMELI: Which one was this?

17:05 5 MR. FLACK: 47.

6 MS. THEMELI: 47. No, it was the one
7 before, 46.

8 THE INTERPRETER: It's the list of names
9 and --

17:05 10 MR. GULDE: 44.

11 MS. THEMELI: 44, okay.

12 THE INTERPRETER: I think so. No, no.

13 MS. THEMELI: Yeah, that one.

14 MR. GULDE: Same one. Will you hand it
17:05 15 to me for a second?

16 MS. THEMELI: Is that where she
17 brought --

18 MR. GULDE: It's a different -- sorry.
19 Same thing.

17:05 20 MS. THEMELI: Yeah.

21 Q. (BY MS. THEMELI) If you turn to the second
22 page of that -- of Exhibit 44.

23 So, you were paid -- it says there that
24 you were paid \$90,000, right?

17:05 25 A. Correct.

1 Q. Okay. And you were paid this entire amount in
2 cash?

3 A. A part. And the other, I did the
4 40,000-dollar contract.

17:06 5 Q. Okay. So, you -- CFX owed you \$90,000, right?

6 A. Yes.

7 Q. Okay. And did they give you \$90,000 in cash
8 and then you gave them back 40,000 for the contract?

9 A. In the contract, the one that we just saw.

17:06 10 Q. What did you do with the \$50,000 in cash?

11 A. In the other contract of 30,000 -- I don't
12 remember if I put it in another part of it in that one.
13 I don't remember very well. I put it in there.

14 Q. Did you -- did you deposit in your bank
17:07 15 account any of this money?

16 A. I would deposit a little bit. I would always
17 reinvest in the contracts. I don't know how much,
18 but...

19 MS. AGUILAR: She also said -- would
17:07 20 you -- may I?

21 MS. THEMELI: Yes, please.

22 MS. AGUILAR: She also said that she
23 would put a little in her bank account.

24 THE INTERPRETER: Yes.

17:08 25 MS. AGUILAR: Is that correct?

1 THE INTERPRETER: Yes.

2 Q. (BY MS. THEMELI) What bank account would that
3 be?

4 A. At Wells Fargo.

17:08 5 Q. How did people or investors carry their money
6 when they came to pick it up at CFX?

7 THE INTERPRETER: How did they carry the
8 money?

9 Q. (BY MS. THEMELI) Yeah. How did they carry
17:08 10 the money? A bag, backpack, envelope?

11 THE INTERPRETER: Their pocket?

12 A. In -- in their purses, the women. And men, I
13 didn't even pay attention. And whatever they had on
14 or...

17:08 15 Q. (BY MS. THEMELI) Did -- did CFX give them
16 any -- like an envelope or anything? Or did they just
17 use their own stuff?

18 A. To whom?

19 Q. To the investors who were picking up money.

17:09 20 A. Yes. They would get a folder to put it in.

21 Q. Folder?

22 A. Not an envelope.

23 (Marked Saravia Exhibit 57.)

24 Q. (BY MS. THEMELI) I just handed you Exhibit
17:09 25 57. This is -- I'll represent to you that this is a

1 record that we obtained from CryptoFX?

2 A. Okay.

3 Q. And it says at the top -- and it's a table,
4 right, with some names in it?

17:10 5 A. Yes.

6 Q. And it says, "LIDERS 2021," at the top?

7 A. Uh-huh.

8 Q. Do you recognize these names: Nallely,
9 Victoria --

17:10 10 A. Victoria Alejo, Lucila -- Nallely, I don't
11 know who it is.

12 Q. Victoria Alejo, is that Vickie that you
13 mentioned earlier?

14 A. Yes. I know Lucy.

17:10 15 Q. Is that Lucila, that you know?

16 A. Yes. I know Ricarda. And I know Maria
17 Dolores; that's me.

18 Q. Yeah. That's you right there, No. 11. Yeah.

19 A. I know Gabriela. Who else?

17:11 20 Q. Okay.

21 A. I already said Ricarda. I know Roberto
22 Zavala.

23 Q. Have you met Roberto Zavala?

24 A. I only would see him. He's from Chicago.

17:11 25 Q. Do you ever talk to him?

1 A. Maybe one or two times. Just "hello."

2 Q. Did -- did you and the other leader friends of
3 yours, did you-all hang out together?

4 A. Everyone was working on -- on his own.

17:12 5 Q. Now, we know Orlin was working out of the Aqua
6 Remach office in Cypress.

7 MS. THEMELI: Aqua Remach.

8 A. I don't know. I never went there. I've also
9 seen him, but I never went to the office.

17:12 10 Q. (BY MS. THEMELI) Do you know if any other CFX
11 leaders working out of any other offices in Houston?

12 A. I only -- I never knew any other office, only
13 that one.

14 Q. Okay. No. 11 there, you saw your name, right,
17:13 15 Maria Dolores Saravia Barrara.

16 A. Barrera.

17 Q. And is "Barrara" -- is that misspelled?

18 A. It is.

19 Q. Okay. Which part of it is misspelled?

17:13 20 A. It's B -- with an E, B-A-R-R-E- --

21 Q. And is that your social number -- Social
22 Security number?

23 A. Yes.

24 Q. And next to your name there under the
17:13 25 column -- the Total column, there is a \$125,000?

1 A. Yes.

2 Q. Okay. And what does that amount mean?

3 A. It's what we had paid -- they told us we got
4 from the contracts, from the bonuses, what we paid was
17:14 5 there. And I paid my taxes.

6 Q. And did you add up all the money that you had
7 made from CFX and made sure that it was actually
8 \$125,000?

9 A. It was a little bit less, 122-. But they put
17:14 10 125-.

11 Q. So, these amounts are not really exact
12 amounts; they're approximations?

13 A. No. But they're more or less -- according to
14 my accounting. But since they did theirs. Norca,
17:15 15 Norma.

16 Q. Norma Garcia?

17 A. Norma Garcia.

18 Q. And you testified earlier that your -- your
19 bonus was always 20 percent, right?

17:15 20 A. Yes.

21 Q. Now, my understanding from the CFX records is
22 that every leader was assigned to a certain person in --
23 in accounting, right?

24 A. Yes.

17:16 25 Q. Who were you assigned to?

1 A. Norma, Norma Chavez.

2 Q. Were you also assigned to Wendy?

3 A. Yes. Wendy would check that everything was
4 correct, and Ms. Norma would receive the money.

17:16 5 Q. Now Norma was sort of the head -- head
6 accounting person, right?

7 A. She was the manager.

8 Q. And she's the aunt of Mauricio?

9 A. Yes.

17:16 10 Q. Did you hang out with Norma outside of CFX,
11 coffee, tea, anything like that?

12 A. No, no.

13 Q. Who did Norma hang out socially outside of
14 CFX, outside of the office?

17:17 15 A. I don't know. She would leave with her
16 husband.

17 Q. Who is her husband?

18 A. I don't know his name. He would bring her and
19 take her.

17:17 20 Q. Did he work at CFX?

21 A. I would see him there sometimes and see them
22 arrive. I don't know. I cannot confirm.

23 Q. How was the money transported from Chicago or
24 LA to -- to Houston?

17:17 25 A. I do not have knowledge of that.

1 Q. Have you ever heard the name Man or Tino?

2 MS. THEMELI: Chino.

3 A. No. What's the name?

4 Q. (BY MS. THEMELI) Man, M-A-N.

17:18 5 A. No.

6 Q. I'm going to give you another exhibit,
7 Exhibit 58.

8 (Marked Saravia Exhibit 58.)

9 Q. (BY MS. THEMELI) It's a CryptoFX document.

17:18 10 Do you see at the top it says: "Reporte,"
11 September 21st, 2022?

12 A. Yes.

13 Q. Okay. And "reporte," does it mean report?

14 A. Okay.

17:19 15 Q. I'm asking you. Is that how you understand it
16 to mean?

17 A. Yes.

18 Q. Okay. And then you have Nombre, Cantidad, and
19 Entrego.

17:19 20 Does that mean quantity? And, then, what
21 does "Entrego" mean?

22 A. I -- it means delivered.

23 Q. Delivered, okay. So, "Nombre" means name,
24 right?

17:20 25 THE INTERPRETER: The problem is --

1 MS. THEMELI: Actually, can you do that?

2 A. Yes.

3 MS. THEMELI: Can you translate it for
4 us?

17:20 5 THE INTERPRETER: "Nombre," name;
6 "Cantidad," amount; "Entrego," Delivered.

7 Q. (BY MS. THEMELI) Okay. And do you see your
8 name right there in the middle of this document,
9 Ms. Saravia?

17:20 10 A. Yes.

11 Q. Okay. Then it says there under amount,
12 \$78,088. And the date next to it is September 16th,
13 2022.

14 A. I wasn't given anything on that date, no.

17:20 15 Q. Did you deliver that amount to CFX on that
16 day?

17 A. It could be possible. I have delivered many.
18 I don't remember. This report --

19 Q. Yeah.

17:21 20 A. I don't understand if this report says that
21 they give it to me or if I gave.

22 Q. Well, I'm asking you: Did you receive -- on
23 September 16th, 2022, did you receive \$78,888 from CFX?

24 A. No.

17:21 25 Q. Okay.

1 A. I haven't received that.

2 Q. Did you deliver to CFX \$78,888 on
3 September 16th, 2022?

4 A. Possibly, but I don't remember. I would
17:22 5 deliver...

6 Q. How was money carried out of the Blalock
7 office?

8 A. How do they take out?

9 Q. That was not a good question.

17:22 10 At the end of the day when all the
11 investors had left the office, would the CFX
12 representatives or employees get the money out of the
13 Blalock office?

14 A. I don't know. I wasn't in the offices with
17:22 15 them. I worked at another place there at the end.

16 Q. Did you ever work in the offices on the second
17 floor?

18 A. No, never.

19 Q. The -- the safe that you described earlier,
17:23 20 that was on the first floor, right?

21 A. That's the way it is.

22 Q. Was that a -- how big was that safe?

23 A. It was small.

24 Q. Was that safe in a -- in a cabinet, or was it
17:23 25 by itself?

1 A. Yes, inside a cabinet.

2 Q. Was it like a white or a black cabinet? Do
3 you recall the color?

4 A. The cabinet was white, but the safe was black.

17:23 5 Q. And that's the only safe that you saw at the
6 Blalock office?

7 A. Yes. That's the only one, the only I saw.

8 Q. Who had the codes to that safe or the keys?

9 A. I.

17:24 10 Q. Did anybody else have the keys or the codes to
11 the safe?

12 A. No. Only I so they wouldn't steal.

13 Q. And who gave you the codes to the safe?

14 A. Where it was bought, the code was with it.

17:24 15 Q. How come Norma, the accountant, didn't have
16 the codes to that safe?

17 A. Because that's where I kept my money. If all
18 of a sudden it was stolen, they wouldn't know if it was
19 her or if it was me.

17:25 20 Q. And, so, you -- in all of CFX employees and
21 representatives, you were the only person who had the
22 codes to that safe?

23 A. Yes.

24 Q. Okay. And who knew that you were the only
17:25 25 person who had the codes to that safe?

1 A. Norma. I told her because she was the
2 manager.

3 Q. And did Mauricio also know that you were the
4 one who had the codes to that safe?

17:26 5 A. I don't remember if I told -- I told him, too.
6 But I informed her so that she would know.

7 Q. Now, if Mauricio wanted to have access to that
8 safe, what would he have to do?

9 A. He would have asked. He would have had to ask
17:26 10 me for the number.

11 Q. Would you have given it to him?

12 A. If I would be present, yes. If not, no.

13 Q. And why is that?

14 A. For my safety. If it was lost, then they
17:27 15 would want -- if it was lost, they -- then they would
16 want me to pay it back.

17 Q. Okay. And the other leaders at CFX, did they
18 have their own safes?

19 A. No.

17:27 20 Q. Okay. So, why were you so special to have
21 your own safe?

22 A. Because I asked for it for safety. Because if
23 they -- if they asked me to work and if there was nobody
24 upstairs, then who is going to manage that money?

17:27 25 Q. What do you mean "if there was nobody

1 THE STATE OF TEXAS)

2 COUNTY OF POLK)

3
4 I, Donna L. Garza, Certified Shorthand
5 Reporter in and for the State of Texas, do hereby
6 certify that the above and foregoing contains a true and
7 correct transcription of all portions of evidence and
8 other proceedings in the above-styled and numbered
9 cause, all of which occurred and were reported by me.

10 I further certify that I am neither counsel
11 for, related to, nor employed by any of the parties or
12 attorneys in the action in which this proceeding was
13 taken, and further that I am not financially or
14 otherwise interested in the outcome of the action.

15 GIVEN UNDER MY HAND AND SEAL OF OFFICE, on
16 this, the 20th day of December, 2022.

17
18 Donna Garza
19



DONNA L. GARZA, TEXAS CSR NO. 4785

20 Expiration Date: 12-31-22
21
22
23
24
25

	08/26/2023
NEW CONTRACTS	\$ 310,500.00
comiciones	\$ (56,235.00)
OLD CONTRACTS	\$ (121,778.00)
ELITE	
	\$ 132,487.00

08/20/2022	REDACTED	\$8,322,456,733	*	\$4,500	GANANCIAS	Sobre
08/28/2022		2819798112	*	\$4,500	GANANCIAS	Sobre
08/25/2022		\$3,466,107,237	*	\$4,950	GANANCIAS	Sobre
08/23/2022		\$4,083,164,240	*	\$4,500	GANANCIAS	Sobre
08/23/2022		\$4,083,164,240	*	\$2,250	GANANCIAS	Sobre
08/26/2022		6159064525	*	\$900	GANANCIAS	Sobre
08/26/2022		6159064525	*	\$2,000.00	CAPITAL	Pagado
08/31/2022		\$3,233,973,055	*	\$2,000	CAPITAL	Sobre
08/31/2022		\$3,233,973,055	*	\$1,080	GANANCIAS	Sobre
08/12/2022		\$8,322,937,205	*	\$3,600	GANANCIAS	Sobre
08/04/2022		FOTO	*	\$2,250	GNANCIAS	Sobre
08/15/2022		8326339539	*	\$9,425.00	1/2 CAPITAL	Sobre
08/28/2022		\$8,322,937,205	*	\$540.00	GANANCIAS	Sobre
08/28/2022		\$8,322,937,205	*	\$1,000	CAPITAL	Sobre
08/23/2022		\$8,322,937,205	*	\$7,290	1/2 GANANCIAS	Sobre
08/21/2022		\$8,322,937,205	*	\$2,250.00	GNANAICAS	Sobre
08/23/2022		4087753925	*	\$900	GANANCIAS	Sobre
08/23/2022		4087753925	*	\$2,000	CAPITAL	Sobre
06/24/2022		4087753925	*	\$3,000.00	CAPOTA	Sobre
06/01/2022		8328751098	/	\$3,000.00	CAPITAL	
08/25/2022		32306849225	/	\$900.00	GANANCIAS	
08/25/2022		32306849225	/	\$2,000	CAPITAL	
06/21/2022		4173106321	/	\$1,450	CAPITAL	
08/29/2022		8328758166	/	\$450.00		
08/29/2022		8328758166	/	\$1,000	CAPITAL	
07/07/2022		3467729486	/	\$4,730.00	2/2 GANANCIAS	
08/11/2022		5623533050	/	\$6,500.00	3/3 CAPITAL	
08/20/2022		5625353050	/	\$5,625	1/2 GANANCIAS	
08/01/2022		\$8,329,703,091	/	\$2,080	capital	
08/21/2022		3463978918	/	\$6,750	1/2 GANANCIAS	
08/18/2022		8328559043	*	\$2,250.00	GANANCIAS	Sobre
08/19/2022		8328559043	*	\$2,250.00	GANANCIAS	Sobre
07/19/2022		8327711410	*	\$4,500.00	2/2 GANANCIAS	Sobre
07/15/2022		8322938474	*	\$2,250	GANAIAS	Sobre

07/23/2022	REDACTED	8328079485	* \$5,500	2/2 CAPITAL	Sobre
07/29/2022		8328079485	* \$5,000	2/2 CAPITAL	Sobre
06/29/2022		8325371757	* \$3,258.00	ganancias	
07/27/2022		8327906359	\$450	GANAICAS	
07/25/2022		8327906359	/ \$1,000.00	CAPITAL	
07/25/2022		8327906359	/ \$450	GANAICAS	
08/01/2022		2819673324	/ \$450.00	GANAICAS	
08/01/2022		2819673324	/ \$1,000.00	CAPITAL	
			\$121,778.00		

08/14/2022	REDACTED	8322363689	* \$10,800	1/2 GANAICAS	YES	*		
09/02/2022		8328671060	* \$4,950	GANANANCIAS	YES	*		
08/20/2022		5623533050	* \$5,625	2/2 GANANCIAS	YES	*		
08/15/2022		* 8326339539	* \$9,425.00	1/2 CAPITAL	YES	WENDY	*	
08/16/2022		8325412202	* \$9,000	1/2 GANANCIAS	YES	*	*	
07/28/2022		8322776588	* \$4,500.00	1/2 GANANCIAS	YES	*		
07/28/2022		\$8,322,776,588	* \$6,750	1/2 GANANICAS	YES	*		
07/26/2022		8322776588	* \$6,750.00	1/2 GANANCIAS	YES	*		
08/15/2022		8178451706	* \$4,500	1/2 GANANCIAS	YES	*		
* 08/24/2022		713-878-2973	* \$6,000.00	1/2 CAPITAL	YES	*		
* 08/24/2022		7138782973	* \$5,000	1/2 CAPITAL	YES	*		
08/10/2022		8326381134	* \$7,250	1/2 CAPITAL	YES	*		
08/20/2022		\$8,322,893,314	* \$5,625	1/2 GANANICAS	YES	*		
08/27/2022		8327906359	* \$1,000	CAPITAL	YES	*		
08/01/2022		3463199123	* \$9,787	1/2 GANANCIAS	YES	WENDY	*	
08/10/2022		8322876834	* \$4,500	2/2 GANANCAS	YES	WENDY	*	
07/26/2022		8322776588	* \$4,500	GANANCIAS	YES	*		
07/27/2022		2816384732	* \$4,500.00	GANAICAS	YES	*		
07/28/2022		34962883837	* \$2,250.00	GANANCIAS	YES	*		
08/03/2022		832-606-4485	* \$4,500.00	GANANCIAS	YES	*		
08/07/2022		2816384732	* \$4,500	GANAICAS	YES	*		
08/15/2022		8328728059	* \$4,000	CAPITAL	YES	*		
08/21/2022		3474320001	* \$4,500	GANANCIAS	YES			
08/24/2022		3474320002	* \$4,050.00	GANANCIAS	YES			
08/24/2022		3474320002	* \$6,165	GANANCIAS	YES			
08/24/2022		3474320002	* \$7,650.00	GANANCIAS	YES			
08/24/2022		3474320002	* \$14,400.00	GANANCIAS	YES		\$162,	